

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SECURITIES AND EXCHANGE COMMISSION,)
)
)
Plaintiff,)
)
vs.) Civil Action No.
) 3:08-CV-0438-G
)
RYAN M. REYNOLDS, ET AL.,) Hon. Judge Joe Fish
)
)
Defendants.)

**PLAINTIFF UNITED STATES SECURITIES AND EXCHANGE
COMMISSION'S RESPONSES TO DEFENDANT BELLATALIA LP'S
FIRST SET OF INTERROGATORIES, REQUESTS FOR
PRODUCTION AND REQUESTS FOR ADMISSION**

Plaintiff Securities and Exchange Commission ("Commission"), in conformity with Rules 26, 33, 34 and 36 of the Federal Rules of Civil Procedure, hereby responds to Defendant Bellatalia LP's ("Defendant") First Set of Interrogatories, Requests for Production and Requests for Admissions (collectively "Discovery Requests") as follows:

GENERAL OBJECTIONS

The following General Objections are incorporated by reference as part of each specific response set forth below:

A. The Commission objects to the Definitions and Instructions Section of Defendant's Discovery Requests in each instance where those definitions and instructions purport to impose obligations beyond the obligations required by Federal Rules of Civil Procedure 26, 33, 34 and 36.

9. Please identify all facts supporting your contention on pages 12-13 of the TRO Brief that Ryan Reynolds and Bellatalia are "underwriters" of the stock of Beverage Creations, Inc.

Response: Please refer to the Response to Interrogatory # 3.

10. Please identify all third-parties (including any other federal or state agency) with whom the SEC communicated during the investigation leading to the instant suit.

Response: The Commission restates and incorporates herein its General Objections, as stated above. Subject to and without waiving those General Objections, the Commission responds: The Commission communicated with following individuals and entities in the investigation leading up to the recent filing of SEC v. Reynolds, et al. on March 13, 2008.

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President: Khalid Rezwan
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11. Please identify all United States government representatives, including the agency with whom each person is affiliated and their title, regarding any SEC investigation or inquiry involving Ryan Reynolds.

Response: The Commission restates and incorporates its General Objections. Subject to and without waiving those General Objections, the Commission responds by incorporating the relevant portions of the Commission's Response to Interrogatory #10.

12. Please identify all persons interviewed by the SEC in any SEC investigation or inquiry involving Ryan Reynolds.

Response: The Commission restates and incorporates herein its General Objections, as stated above. Subject to and without waiving those General Objections, the Commission responds: The Commission interviewed the following individuals and entities in the investigation leading up to the recent filing of SEC v. Reynolds, et al. on March 13, 2008.

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President: Khalid Rezwan
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13. Please identify all persons interviewed by the SEC in connection with its investigations leading to institution of the instant suit.

Response: Please refer to Response to Interrogatory #12.

14. Please identify all persons who the SEC intends to present as witnesses during the preliminary hearing in the instant suit, including a description of the matters on which each person will testify.

Response: The Commission hereby submits this list of proposed hearing witnesses. The Commission submits this list without waiving the Commission's right to call any person presented by any of the defendants in this matter. The Commission also reserves the right to call additional witnesses if unforeseen circumstances arise or as the Court may deem appropriate. The Commission also reserves the right to call rebuttal witnesses. Without waiving the rights listed above, the Commission presently intends to

call the following witnesses at the hearing in this matter scheduled to commence on April 2, 2008:

1. Carlton Fleming
Defendant in the pending litigation filed March 13, 2008
c/o Patrick Craine, Esq.
Bracewell & Giuliani LLP
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Dallas, Texas 75202
(214)758-1048
patrick.craine@bglp.com

Mr. Fleming will testify about the transactions involving BCI stock as set forth in the SEC's Complaint, about the promotion of BCI stock, and about his communications with BCI and the other defendants concerning BCI and its stock. In addition, Mr. Fleming may testify about his transactions involving the stock of other issuers, including the stock of Connect-A-Jet.

2. Jason Wynn
Defendant in the pending litigation filed March 13, 2008
c/o Randy Henderson, Esq.
7037 Highway 6 North, #107
Houston, Texas 77095
713-870-8358
hendersonrandy@hotmail.com

Mr. Wynn will testify about the transactions involving BCI stock as set forth in the SEC's Complaint, about the promotion of BCI stock, and about his communications with BCI and the other defendants concerning BCI and its stock. In addition, Mr. Wynn may testify about his transactions involving the stock of other issuers, including the stock of Connect-A-Jet.

3. Ryan Reynolds
Defendant in the pending litigation filed March 13, 2008
c/o Spencer C. Barasch, Esq.
Andrews Kurth LLP
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214-659-4685

Mr. Reynolds will testify about the transactions involving BCI stock as set forth in the SEC's Complaint, about the promotion of BCI

stock, and about his communications with BCI and the other defendants concerning BCI and its stock. In addition, Mr. Reynolds may testify about his transactions involving the stock of other issuers, including the stock of Connect-A-Jet.

4. Robert Wieden
President and CEO of BCI
c/o Stanley C. Morris, Esq.
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Mr. Wieden will testify, both in his personal capacity and presumably as a Rule 30(b)(6) corporate designee of BCI, about the Subscription Agreements discussed in the SEC's complaint, about his communications and interactions with the non-BCI defendants concerning the sale and promotion of BCI stock, and about the promotion of BCI and its stock in 2007 and 2008.

5. Reagan Rowland
Administrator of TheStockPic.com
c/o Randy Henderson
7037 Highway 6 North, #107
Houston, Texas 77095

Ms. Rowland will testify about the promotion of BCI stock, about her communications with defendants, about her collaboration with defendants concerning the promotion of the stock of other issuers, and about her receipt and sale of the stock of the aforementioned issuers.

6. Stephen Fayette
Stock broker at Fagenson
c/o Martin Russo, Esq.
437 Madison Avenue
New York, NY 10022
Phone: (212) 940-3771
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Fax: (866) 590-4681
mrusso@nixonpeabody.com

Mr. Fayette will testify about his and defendants' involvement in transactions concerning BCI stock, Connect-A-Jet stock, and perhaps the stock of other issuers.

7. Stephen J. Czarnik, Esq.
Cohen & Czarnik LLP
17 State Street – 39th Floor
New York, NY 10004
Phone: 212 232-8323
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Mr. Czarnik will testify about his communications with defendants, and about the opinion letter and other documents he drafted or edited in his capacity as counsel for BCI.

8. John Kustusch
Staff Accountant at Securities and Exchange Commission
c/o Jonathan Polish
Securities and Exchange Commission
Chicago Regional Office
175 W. Jackson Blvd. Suite 900
Chicago, IL 60604
Phone: 312 353-6884

Mr. Kustusch will testify about the matters set forth in his declaration, which the Commission filed contemporaneous with the filing of its TRO Motion, and regarding the calculation of disgorgement and damages.

In addition to the witnesses set forth above, the SEC will likely be issuing subpoenas to Summit Advisory Partners, LLC and Lynn Thomas Group, and perhaps others, seeking deposition testimony and documents. Should such evidence prove relevant for purposes of the hearing, the SEC will supplement its answer to this interrogatory. In addition, should BCI offer Rule 30(b)(6) designees above and beyond Mr. Wieden, the Commission will, should it choose to offer such additional testimony in the hearing, supplement its answer to this interrogatory appropriately. Further, the Commission may rely upon affidavits at the hearing. In such event, it will supplement its answer to this interrogatory in a timely manner.

**SPECIFIC RESPONSES AND OBJECTIONS TO DEFENDANT'S REQUESTS
FOR DOCUMENT PRODUCTION**

1. Please produce all documents that support each contention in paragraph 1 of the Complaint.

Response: The Commission restates and incorporates its General Objections, as stated above. Subject to and without waiving those General Objections, the Commission